

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

KEVIN VENTURA,

Movant,

v.

UNITED STATES OF AMERICA,  
Respondent.

Civil No. 1:20-cv-08064-JGK

Crim. No. 1:09-cr-01015-JGK

Hon. John G. Koeltl

DOCUMENT  
ELECTRONICALLY FILED  
DCC #:  
DATE FILED: 11/16/2020

MOVANT'S MOTION FOR ENLARGEMENT OF TIME  
WITHIN WHICH TO FILE MEMORANDUM OF LAW IN SUPPORT  
OF MOTION UNDER 28 U.S.C. § 2255 TO VACATE, SET ASIDE,  
OR CORRECT SENTENCE BY A PERSON IN FEDERAL CUSTODY

NOW COMES Movant Kevin Ventura "Movant"), acting pro se, and moves this Honorable Court for a thirty- (30) day enlargement of time, up to and including until December 9, 2020, within which to file his memorandum of law in support of his previously-filed Section 2255 motion.

In support of this motion Movant states as follows.

1. USP Canaan, the facility in which Movant is currently incarcerated, is still operating on a modified lock down schedule due to the Covid-19 novel coronavirus, with inmates having much more limited access to the facility's electronic law library than when the prison is under normal operations.

2. Based upon the above, Movant needs additional time to perfect his memorandum of law in support of his Section 2255 motion.

WHEREFORE, Movant prays that this motion will be granted.

APPLICATION GRANTED  
SO ORDERED

John G. Koeltl, U.S.D.J.

Date: 11/05/2020

Respectfully submitted,

Kevin Ventura - #70750-054  
USP Canaan - P.O. Box 300  
Waymart, Pennsylvania 18472

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing was sent, via first-class prepaid mail, this 5th day of November, 2020, to the following counsel for the Government:

Mr. Matthew R. Shahabian  
Assistant United States Attorney  
Southern District of New York  
One St. Andrew's Plaza  
New York, NY 10007

A handwritten signature in black ink, appearing to read 'Kevin Ventura', is written over a horizontal line.

Kevin Ventura

Kevin Ventura  
Reg. No. 70750-054  
U.S. Penitentiary Canaan  
P.O. Box 300  
Waymart, Pennsylvania 18472

November 5, 2020

Office of the Clerk  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Ventura v. USA, 1:20-cv-8064-JGK (1:09-cr-1015-JGK)

Dear Sir/Madam:

Enclosed for filing in this matter please find the original and one (1) copy of Movant's Motion for Enlargement of Time Within Which to File Memorandum of Law in Support of Motion Under 28 U.S.C. § 2255 to Vacate, Set Aside, or Correct Sentence by a Person in Federal Custody.

Thank you very much for your attention to this matter.

Very truly yours,



Kevin Ventura

Encls.

cc: Matthew Shahabian, AUSA

Case 1:09-cr-01015-JGK Document 433 Filed 11/13/20 Page 4 of 4

**CERTIFIED MAIL**



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Kevin Ventura  
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United States Penitentiary  
USP Canaan  
P.O. Box 300  
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